

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

American Electric Power
1 Riverside Drive
Columbus, Ohio 43215

ATTENTION:

John McManus, Vice President of Environmental Services

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring American Electric Power (AEP) to submit certain information about its Conesville and Gavin Generating Stations located in Conesville and Cheshire, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send the required information to EPA according to the schedules outlined in the Appendix.

EPA is issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

AEP owns and operates the Conesville and Gavin Generating Stations, which are emission sources under the CAA. EPA is requesting this information to determine whether your emission sources are complying with the CAA, the Ohio State Implementation Plan and other applicable permit terms and requirements.

You must send all required information to:

Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency - Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

AEP must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

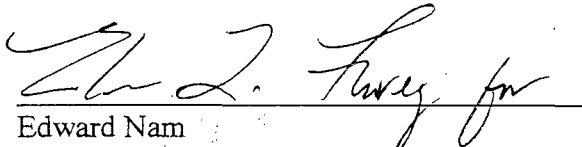
As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix D provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action. Failure to comply fully with this information request may subject AEP to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Ethan Chatfield at (312) 886-5112 or chatfield.ethan@epa.gov.

6/6/16
Date


Edward Nam
Acting Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B and C, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B and C.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix D for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
2. The term "AEP" shall mean American Electric Power, AEP Corporation, and all subsidiaries and related entities.

Appendix B

Information You Are Required to Submit to EPA

AEP shall provide the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days from receipt of this Request.

1. For each coal-fired unit currently in service at the Conesville Generating Station, provide a chart containing the following information:
 - a) the emission unit identification number;
 - b) the date or year commercial operation began;
 - c) any scheduled or planned unit retirement, refueling, or repowering dates;
 - d) the original design and current gross generating capacity (MWg/MWn);
 - e) the original design and current maximum heat input capacity (MMBtu/hr);
 - f) type of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), mercury, and/or sulfuric acid mist (H₂SO₄ or SO₃) emissions control device (manufacturer and design), date each commenced operation, date of any upgrades, and design outlet emission rates and removal efficiency guarantees of each device;
 - g) any additional anticipated emission controls and estimated dates of installation;
 - h) the design and current SO₂ to sulfur trioxide (SO₃) conversion rate of any Selective Catalytic Reduction (SCR) System, and any documents that discuss the SO₂ to SO₃ conversion rate, including, but not limited to, specifications supplied to SCR vendors with invitations to bid, contracts with the SCR vendor, and measurements of SO₂ to SO₃ conversion rate performed after installation of the SCR; and
 - i) if the unit is equipped with any continuous emissions monitoring systems (CEMS), the type of system, the compound(s) monitored, and the date of installation.
2. Provide copies of the Quarterly Deviation and Compliance Monitoring Reports (i.e., Excess Emission Reports) which AEP submitted to the Ohio Environmental Protection Agency (OEPA) from June 1, 2011, through the date of this request for the Conesville and Gavin Stations.
3. Provide an electronic (Microsoft Excel compatible) copy of all continuous opacity monitor (COM) data that is in excess of 20% opacity for each coal-fired boiler at the Conesville and Gavin Stations from June 1, 2011, to the date of this request. Include data from uncertified COMs as well, if available. COM data should include percent opacity, date and time of reading, a reason/action code with description, the flue gas temperature, and the operating status of each boiler for each 6-minute average opacity exceedance period. Highlight any periods which exceed the 20% opacity limitation but that AEP contends is not a violation of the applicable standard. Providing copies of the Quarterly Deviation and Compliance Monitoring Reports is not sufficient in responding to this request. Do not provide all COM data during this period, but only the 6-minute average data that exceeds the 20% opacity limitation. Provide opacity data for each unit in a

single, separate spreadsheet (i.e. do not provide each year or month in a separate spreadsheet).

4. Provide copies of all visible emission observations conducted using EPA Method 9 or other non-COMS methodology for each unit at the Conesville and Gavin Stations completed from June 1, 2011, to the date of this request.
5. Provide a copy of all documents that provide an estimate of sulfuric acid (H_2SO_4 or sulfuric acid mist) and/or SO_3 emissions from any unit at the Conesville and Gavin Stations from January 1, 2005, to the date of this request.
6. Provide a copy of all documents, studies, evaluations, assessments, and reports discussing or related to SO_3 , H_2SO_4 , mercury control, or acid aerosols at the Conesville and Gavin Stations from January 1, 2005, to the date of this request.
7. Provide copies of all stack tests reports (or emissions/engineering test results, even if no report was generated) for any coal-fired unit at the Conesville and Gavin Stations for total PM, PM_{10} , $\text{PM}_{2.5}$, H_2SO_4 , hydrochloric acid (HCl), Mercury, and SO_3 from January 1, 2005, to the date of this request.
8. Provide a detailed description of all additives, techniques, controls, process changes, or other measures to reduce the emissions of SO_3 or H_2SO_4 at the Conesville Station which AEP has employed, is employing, or plans to employ. If applicable, this description shall include, but not be limited to, the rate at which any material (i.e., sorbent) has been, is, or will be added, the specific chemical composition and concentration of the additive, the location of additive injection ports, the designed molar ratio of any sorbent, and the dates each emissions control technique has been employed. Specify the current sorbent type being used (if any) at each unit and the minimum injection rate(s) currently being utilized.
9. Provide an electronic copy (in Excel compatible format) of any and all logs or other documents from June 1, 2011, to the date of this request, that show at what rate AEP utilized any additives, sorbents, reagents, techniques, controls, processes, or other measures for controlling SO_3 , H_2SO_4 , or acid aerosols on a hourly basis (or longer period, if hourly data is not available) at the Conesville and Gavin Stations. At a minimum, the logs should provide the date and time, the unit load (in MW_{gross}), the heat input, the additive flow rate and density, and the sorbent injection rate (lbs/hr).
10. Provide copies of all past and current written operating procedures or protocols related to additive injection for $\text{SO}_3/\text{H}_2\text{SO}_4$ control at the Conesville and Gavin Stations.
11. Provide a flow diagram of the emission control systems (i.e., PM, NO_x , SO_2 , and SO_3 emission control equipment in relation to the other equipment operating at the plant) currently employed at each coal-fired unit at the Conesville and Gavin Stations. Include in the diagrams the specific location(s) any sorbent is injected (or was previously injected) for control of $\text{SO}_3/\text{H}_2\text{SO}_3$.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B and C, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

John McManus, Vice President
Environmental Services
American Electric Power
1 Riverside Drive
Columbus, Ohio 43215

Mike Zwick, Plant Manager
Conesville Station
American Electric Power
47201 County Road 273
Conesville, Ohio 43811

7014 2870 0001 9581 4823

Phil Bailey
Gavin Generating Station
American Electric Power
7397 N. State Route #7
Cheshire, Ohio 45620-0271

7014 2870 0001 9581 4830

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Robert Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, Ohio 43215

Melissa Witherspoon, Acting Assistant Chief
Ohio EPA/DAPC, Southeast District Office
2195 Front Street
Logan, Ohio 43138

Janet J. Henry
Deputy General Counsel
American Electric Power
1 Riverside Plaza
Columbus, OH 43215

On the 8th day of June 2016.

Kathy Jones

Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9581 7516